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September 14, 1995

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FEDERAL COMMUNICATIONS COMMISSION  
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DEBRA BERLYN

William Canton  
Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554


RE: Administration of the North American  
Numbering Plan  
CC Docket No. 92-237

Dear Secretary Canton:

Enclosed please find an Application for membership in the North American Numbering Council. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,

  
Debra Berlyn  
Executive Director

Enclosures

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**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

Administration of the North American )  
Numbering Plan ) CC Docket No. 92-237

**APPLICATION**

The National Association of State Utility Consumer Advocates hereby applies for membership on the North American Numbering Council, and in support thereof, states as follows:

1. The National Association of State Utility Consumer Advocates (NASUCA) seeks membership on the North American Numbering Council (Council) as the representative of consumers of telecommunications services.

2. NASUCA's mailing address, e-mail address, telephone number, and fax number are:

NASUCA  
1133 15th Street, N.W., Suite 550  
Washington, D.C. 20005  
nasuca@nasuca.org (e-mail)  
202-727-3908 (telephone)  
202-727-3911 (fax)

3. NASUCA is an organization comprised of officials from 38 states and the District

of Columbia. NASUCA's members are authorized by state law to represent utility ratepayers before state and federal regulatory agencies and the courts. NASUCA was founded in 1979 in order to assist its member agencies to represent the interests of consumers at the state and national levels. As evidence of its authority to represent consumers, the relevant portions of NASUCA's constitution and its membership list are attached hereto and incorporated herein.

4. NASUCA represents the interests of telecommunications consumers in the majority of states and, as such, is uniquely situated to provide consumer representation. Such broad consumer representation cannot be met by any other applicant. NASUCA is an interested party because its representation is essential to providing consumers easy access to the public switched network in a fair and competitive neutral manner.

5. NASUCA will actively participate in good faith to meet the following objectives: (1) that the NANP facilitates entry into the communications marketplace by making number resources available on an efficient, timely basis to communications service providers; (2) that the NANP does not unduly favor or disfavor any particular industry segment or group of consumers; (3) that the NANP gives due regard to state and local interest; (4) that the NANP does not unduly favor one technology over another; (5) that the NANP gives consumers easy access to the public switched telephone network; and (6) that the NANP ensures that the interests of all NANP member countries are addressed

fairly and efficiently, fostering continued integration of the NANP across NANP member countries.

6. As its representative, NASUCA nominates:

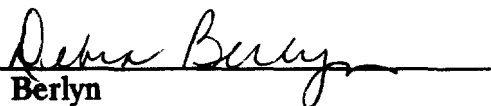
**Martha Hogerty**  
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**Missouri Office of the Public Counsel**  
**P.O. Box 7800**  
**Jefferson City, Missouri 65102**  
**314-751-4857 (telephone)**  
**314-751-5562 (fax)**

As NASUCA's alternate representative, NASUCA nominates:

**Debra Berlyn**  
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Respectfully submitted,

**NATIONAL ASSOCIATION OF STATE  
UTILITY CONSUMER ADVOCATES**

By   
**Debra Berlyn**  
**Executive Director, NASUCA**  
**1133 15th Street, N.W., Suite 550**  
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**CONSTITUTION  
OF THE  
NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES**

**ARTICLE I**

**NAME**

The name of this organization shall be the National Association of State Utility Consumer Advocates.

**ARTICLE II**

**PURPOSE**

The purpose of this organization shall be to improve communication among members, to enhance their impact on public policy at the state and federal levels, and otherwise to assist them in the representation of utility consumer interests.

**ARTICLE III**

**MEMBERSHIP**

**SECTION 1. STATE UTILITY CONSUMER ADVOCATE OFFICES.**  
Each State Utility Consumer Advocate office shall be entitled to membership, provided:

- (a) That office operates independently of state utility regulatory commission(s) with respect to hiring and firing of personnel and fiscal control; and
- (b) That office has been designated by the legislature of the State as the agency for the representative of utility consumer interests before state or federal regulatory agencies; and
- (c) That office has the right to appeal decisions of the state regulatory commission to the Courts within that state.

- SECTION 2.** **STATE OFFICES OF THE ATTORNEY GENERAL.** Each State office of the Attorney General shall be entitled to name a member of its staff for membership in this organization provided that the person so designated is actively engaged in the representation of consumer interests before utility regulatory agencies and is not the legal representative of the state utility regulatory agency.
- SECTION 3.** An organization with statewide jurisdiction other than a state agency may be admitted to membership provided that it has been specifically authorized by state law to represent the consumer interests of that state before utility regulatory agencies.
- SECTION 4.** **INITIAL MEMBERSHIP.** The initial members of this organization shall be the agencies represented by the signatories of this Constitution. Admission of additional members and disqualification of existing members shall be determined by a vote of the membership.
- SECTION 5 .** **VOTING.** Except for nonpayment of dues as provided in the By-Laws of this organization, each member organization shall have one vote in all situations requiring votes of the general association or any individual committees thereof.
- SECTION 6.** **ASSOCIATE MEMBERSHIP.** A State official or agency or an organization shall be entitled to Associate Membership in this organization provided:
- (a) That the official, agency or organization be actively engaged in the representation of utility customers before regulatory agencies; and
  - (b) That the official, agency or organization subscribe to the purposes and goals of this organization as stated in Constitution and By-Laws; and
  - (c) That the official, agency or organization operate independently of the regulatory commission with respect to policy determination, hiring and firing of personnel, and fiscal control, and have the right to appeal decisions of the state regulatory commission to the Courts within that state; and

(d) That the official, agency or organization be designated for Associate Membership pursuant to a procedure set forth in the By-Laws.

**SECTION 7.**

**AFFILIATE MEMBERSHIP.** An organization may be admitted to Affiliate Membership in this organization provided that it represents the interests of utility consumers, operates independently of the regulatory commission with respect to policy determination, hiring and firing of personnel, and fiscal control, subscribes to the purposes and goals of this organization as stated in the Constitution and By-Laws, and is designated for Affiliate Membership pursuant to a procedure set forth in the By-Laws.



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